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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** ALL PAPERS SHALL BE FILED IN
THE LEAD CASE, NO. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF SUBMISSION OF PROPOSED
ORDER APPROVING MEDIATORS FOR
SECURITIES ADR AND RELATED
PROCEDURES**

[Relates to Dkt. No. 10015]

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas
2 and Electric Company (collectively, the “**Debtors**” or “**Reorganized Debtors**”) filed voluntary
3 cases for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court
4 for the Northern District of California (the “**Bankruptcy Court**”). On June 20, 2020, the
5 Bankruptcy Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of
Reorganization Dated June 19, 2020* [Dkt. No. 8048] (as may be modified, supplemented, or
amended from time to time, and together with all schedules and exhibits thereto, the “**Plan**”). The
Plan became effective on July 1, 2020.¹

6 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court held a hearing on
7 November 18, 2020, at 10:30 a.m. (Pacific Time) before the Honorable Dennis Montali, United
8 States Bankruptcy Judge, to consider the *Reorganized Debtors’ Motion to Approve Securities ADR
and Related Procedures for Resolving Subordinated Securities Claims* filed by the Debtors on
September 1, 2020 [Dkt. No. 8964].

9 **PLEASE TAKE FURTHER NOTICE** that, on January 25, 2021, after hearing from
10 numerous parties including a number of securities claimants and counsel, the Bankruptcy Court
11 entered the *Order Approving Securities ADR and Related Procedures for Resolving Subordinated
Securities Claims* [Dkt. No. 10015] (the “**Securities ADR and Related Procedures Order**”).

12 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the Securities ADR and Related
13 Procedures Order, the Reorganized Debtors have compiled, for consideration and approval by the
14 Bankruptcy Court, two panels of qualified and experienced mediators that the Reorganized Debtors
15 propose shall constitute, respectively, the Panel of Mediators for Abbreviated Mediations and the
16 Panel of Mediators for Standard Mediations (together, the “**Mediation Panels**,” and each proposed
17 mediator, a “**Mediator**”). Attached hereto as **Exhibit A** is a proposed order approving the Mediation
18 Panels (the “**Proposed Order**”). The Proposed Order includes the proposed Panel of Mediators for
Abbreviated Mediations as **Exhibit A-1** and the proposed Panel of Mediators for Standard Mediations
as **Exhibit A-2**. The Reorganized Debtors have submitted the Proposed Order and its attachments to
the Bankruptcy Court for approval concurrently herewith.

19 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the procedures set forth in the
20 Securities ADR and Related Procedures Order, attached hereto as **Exhibit B** is a compilation of each
21 Mediator’s resume or curriculum vitae showing his or her college and post-graduate education, legal
and ADR experience, and other biographical or pertinent information.

22 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the Securities ADR and Related
23 Procedures Order, attached hereto as **Exhibit C** is a compilation of each Mediator’s disclosure
24 regarding any current or past work that such proposed Mediator has performed for, or on behalf of,
25 the Debtors or Reorganized Debtors, or their primary legal counsel (Weil, Gotshal & Manges LLP,
Keller Benvenutti Kim LLP, Latham & Watkins LLP, or Cravath, Swaine & Moore LLP) in the past
five years, and any other potential conflicts that, in the Mediator’s view, could create a reasonable
inference of bias.

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28 ¹ Any capitalized terms not defined herein have the definition assigned to them in the Plan or in the
Securities ADR and Related Procedures Order.

1 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents
2 identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at
3 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
4 Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors' notice and claims
agent, Kroll Restructuring Administration LLC, at <https://restructuring.ra.kroll.com/pge> or by calling
(844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties. Note
that a PACER password is needed to access documents on the Bankruptcy Court's website.

5 Dated: May 11, 2023

6 **WEIL, GOTSHAL & MANGES LLP**
7 **KELLER BENVENUTTI KIM LLP**

8 /s/ Richard W. Slack
Richard W. Slack

9 *Attorneys for the Debtors and Reorganized Debtors*